

## **CONSUMER DEFENSE GROUP ACTION**

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950 South Coast Drive, Suite 220

Costa Mesa, CA 92626

Telephone: (714) 850-9390

Facsimile: (714) 850-9392

### **Amended 60 Day Notice of Intent to Sue Exxon Mobil Corporation and ExxonMobil Oil Corporation Under Health & Safety Code Sections 25249.5 and 25249.7**

Consumer Defense Group Action, a California corporation (hereinafter "CDG" or the "Noticing Party") hereby gives Notice of Intent to Sue Under Health & Safety Code Section 25249.5 (the "Notice") to Lee Raymond, the Chairman and CEO of Exxon Mobil Corporation and ExxonMobil Oil Corporation and any of their consolidated subsidiaries or related divisions including but not limited to Exxon Corporation, Mobil Oil Corporation, Mobil Oil Refining Corporation, Mobil Corporation, Mobil California Pipeline Company, ExxonMobil Pipeline Company, ExxonMobil Development Company, ExxonMobil Sales and Supply Corporation, and ExxonMobil Global Services Company (hereinafter collectively referred to as "EXXONMOBIL"), as well as the governmental entities on the attached proof of service. The Noticing Party can be contacted through Anthony G. Graham at the above address.

#### **Summary of Violation**

This Notice is intended to inform EXXON MOBIL that it is in violation of Proposition 65, the Safe Drinking Water and Toxic Enforcement Act (commencing with Health & Safety Code Section 25249.5) (hereinafter "Proposition 65"). Proposition 65 absolutely prohibits any business from contaminating the drinking water supplies of California. EXXON MOBIL is in violation of Proposition 65 because it has and is knowingly and intentionally threatening to "release chemicals known to the State of California to cause cancer or reproductive toxicity into water or onto or into land where such chemical passes or probably will pass into any source of drinking water," at each of the facilities listed on Exhibit A hereto (hereinafter "the Facilities"), which are EXXON MOBIL branded gasoline stations with underground storage tank systems. Health & Safety Code Section 25249.5 and 25249.7. Proposition 65 provides that when a party, such as EXXON MOBIL, an entity with more than ten employees, has been and is knowingly and intentionally threatening to "release chemicals known to the State of California to cause cancer or reproductive toxicity into water or onto or into land where such chemical passes or probably will pass into any source of drinking water," it is violating Health & Safety Code Section 25249.5 and may be enjoined from such conduct pursuant to Health & Safety Code Section 25249.7. The chemicals which EXXON MOBIL is threatening to release are benzene and toluene ("the Designated Chemicals"), which are contained in the gasoline and other refined petroleum products which EXXON MOBIL markets and stores within underground storage tank systems owned and/or operated by EXXON MOBIL located at the Facilities. In order to be in compliance with Proposition 65, EXXON MOBIL must effectively contain the Designated Chemicals in a UST system that is "product tight." For these purposes, "product tight" means that the operations must be impervious to the liquid and vapor of the substance ("the Designated Chemicals") that is or are contained or to be contained, in the underground storage tank systems so as to prevent seepage of the Designated Chemicals from the containment and in to or on to the ground where the Designated Chemicals will pass or probably will pass into any source of drinking water.



## The Violation

EXXON MOBIL markets gasoline and other refined petroleum products (hereinafter referred to as "gasoline") to both consumers and retailers. Gasoline is marketed under the EXXON MOBIL trademark directly to motorists at EXXON MOBIL branded retail outlets in California and elsewhere. EXXON MOBIL owns and/or operates numerous underground storage tank systems located at the Facilities that are used for the storage of gasoline offered for sale by EXXON MOBIL to the general public. The operation by EXXON MOBIL of the underground storage tank systems located at the Facilities, as well as the delivery, storage and dispensing of gasoline at the Facilities, as currently controlled and managed by EXXON MOBIL, poses a substantial threat of discharge of gasoline and other refined petroleum products "into water or onto or into land where such chemical passes or probably will pass into any source of drinking water".

All water within the State, including groundwater, is the property of the people of the State of California. California Water Code §§ 102 and 104. As to all water, the Legislature of the State of California ("the Legislature") has determined that "the people of the State have a primary interest in the conservation, control and utilization of the water resources of the state, and that the quality of all waters of the State shall be protected for use and enjoyment of the people of the state." California Water Code § 13000. Under Proposition 65 a "source of drinking water" is not confined to existing drinking water supplies. Rather, a "[s]ource of drinking water means either a present source of drinking water or water which is identified or designated in a water quality control plan adopted by a regional board as being suitable for domestic or municipal uses [and] also includes water identified in a regional board" water quality control plan as being suitable for domestic or municipal uses." Health & Safety Code §25249.10 (d). The "source of drinking water" into which the Designated Chemicals "probably will pass" are identified on Exhibit A hereto.

Gasoline contains a number of constituents and additives each of which separately, as well as in combination, present a significant risk to human health, safety and the environment. The gasoline marketed by EXXON MOBIL contains the chemicals Benzene and Toluene. Benzene is a clear, colorless, highly reactive flammable liquid derived from petroleum and contained in gasoline. Benzene is a chemical known by the State of California to cause cancer and has been listed as such pursuant to Proposition 65. Toluene is a colorless flammable liquid obtained from coal tar or petroleum and contained in motor vehicle fuels. Toluene is a chemical known by the State of California to cause reproductive toxicity and has been listed as such pursuant to Proposition 65. Hereinafter benzene and toluene are referred to as the "Designated Chemicals".

The gasoline service station operations undertaken at the Facilities are not "product tight" (i.e. the operations are not impervious to the liquid and vapor of the substance that is contained, or is to be contained, in the underground storage tank systems so as to prevent seepage of the Designated Chemicals from the containment and into the ground) and thus are threatening to cause a discharge of Designated Chemicals. The following are the components of the gasoline service station operations that pose a threat of discharge of Designated Chemicals: the underground tank(s) and underground storage tank system(s); the pipes used in connection with the storage of the Designated Chemicals in the USTs, including connecting pipes, vapor recovery lines, vent lines and associated fittings as well as the associated secondary containment systems; the drainage systems which collect surface water run off from the petroleum dispensing and delivery areas; secondary containment and spill control systems, including but not limited to secondary containment for the underground tank system, pipe, connecting pipe, dispensers and dispenser piping and the petroleum delivery area, as well as for the drainage systems which collected surface water run off from the dispensing and delivery area.



At the Facilities, the gasoline containing Designated Chemicals is stored in one or more underground storage tank(s) and an underground storage tank system (hereinafter referred to collectively as "the USTs"), which includes, but is not limited to, one or more tanks, including the piping connected thereto. The pipes used in connection with the storage of the Designated Chemicals in the USTs includes but is not limited to valves and other appurtenances connected to the pipe, pumping units, fabricated assemblies associated with the pumping units, and metering and delivery stations and fabricated assemblies therein. The pipes used in connection with the storage of the Designated Chemicals in the USTs include "connecting piping", such as pipe, valves elbows, joints, flanges and flexible connectors through which the Designated Chemicals flow. The UST system also includes the vapor recovery lines, vent lines and associated fittings as well as the associated secondary containment systems, the drainage systems which collect surface water run off from the petroleum dispensing and delivery areas. Finally, the UST systems include secondary containment and spill control systems including but not limited to secondary containment for the underground tank system, leak detection sensors, pipe, connecting pipe, dispensers and dispenser piping and the petroleum delivery area, as well as for the drainage systems which collect surface water run off from the dispensing and delivery area.

Investigations and reports conducted and prepared for the California State Water Resources Control Board ("SWRCB") (with the assistance and input of the Environmental Health Divisions and Departments for a number of California counties and Regional Water Quality Control Boards as well as various members of the oil industry), the California Environmental Protection Agency ("CEPA"), Department of Toxic Substances Control ("DTSC"), the Office of Pollution Prevention and Technology Department, as well as testing undertaken by the various city fire departments where the Facilities are located, demonstrate that discharges of petroleum products including the Designated Chemicals occur, and are expected to occur, from the gasoline service station operations at the Facilities on a regular and ongoing basis. The CWRQB Report concluded that 61% of all USTs in operation, at any given time, are discharging/releasing gasoline and other refined petroleum products including the Designated Chemicals into or on to the land. The CWRQB Report also found that the percentage of USTs found to be discharging/releasing gasoline and other refined petroleum products including the Designated Chemicals into or on to the land was not materially different whether the underground storage tank was single or double-walled. EXXON MOBIL, as well as the oil industry in general, know of these facts.

Because EXXON MOBIL, as well as the oil industry in general, is aware of these facts, EXXON MOBIL, along with the oil industry, have in place leak detection sensor systems. The fact that EXXON MOBIL uses such a system is an acknowledgement by EXXON MOBIL that it knows that the USTs it operates are likely to leak at any given time. The sensors do not inform EXXON MOBIL that the USTs are about to release product, only, at best that the USTs have leaked and/or are leaking product, including the Designated Chemicals. Further, the CWRQB Report noted that the leak detection systems in use by the industry only record a discharge from the USTs where the leak is **more than 0.1 gallons/hour (2.4 gallons a day, or 876 gallons a year per sensor)**. That is, even under this extremely lax standard, EXXON MOBIL does not even record a discharge until an individual tank sensor (of which there are usually more than one in any UST) records a discharge of **greater than 876 gallons a year**. Naturally, the level of non-recorded discharge can be much higher for any individual UST since there may be four or more sensors in any given system **each of which** is failing to record a discharge of slightly less than 876 gallons a year. Finally, a report prepared by the SWRCB Underground Storage Tank Program entitled "Field Evaluation of Underground Storage Tank System Leak Detection Sensors" expressly found that the leak detection sensors systems used by the oil industry, including EXXON MOBIL, are not reliable where, as the report noted, the sensors have not been properly installed, programmed, maintained and operated, or when the secondary containment in which they are installed are not working properly. The SWRCB, in analyzing the use of leak detection sensor systems by the oil industry (including EXXON MOBIL), specifically noted a number of significant problems which greatly lessened the utility of such sensors including the following: "sensors were raised from the low point of the secondary containment, sensors fail[ed] to alarm when tested, and sensors fail[ed] to shut down the turbine



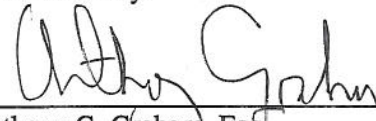
pump in the event of an alarm.” The report went on to note that almost a third of the secondary containment systems had water or product in one or more areas, a fact which would seriously impact the operational effectiveness of the sensor detection systems. Under these circumstances, the sensors will simply not operate effectively, even at the lax warning level used by EXXON MOBIL. Further, since such sensors, even when working properly, do not prevent leaks but, at best, simply record them, they are ineffective to avoid liability under Health & Safety Code sections 25249.5 and 25249.7. In order to be in compliance with Proposition 65 EXXON MOBIL must therefore effectively contain the Designated Chemicals in a UST system which is “product tight”, as defined above.

The gasoline service operations of EXXON MOBIL therefore pose and threaten to pose an imminent treat to human health or safety or the environment and therefore create a substantial probability of harm since there is a substantial likelihood that the majority of the USTs operated and maintained by EXXON MOBIL are either currently or likely will shortly discharge/release gasoline and other refined petroleum products into or on to the land. Such a discharge/release of the Designated Chemicals from the USTs at the Facilities “probably will pass into [a] source of drinking water.” It is clear therefore that for the entire period of time that EXXON MOBIL has owned and/or controlled the USTs located at the Facilities, EXXON MOBIL has been and continues to be in violation of Proposition 65. Given that the maximum prior period of potential liability pursuant to Proposition 65, Business & Professions Code §17200 and Fish & Game Code §5650(which are the operative statutes pursuant to which a complaint will be filed against EXXON MOBIL) is four years, this Notice is intended to inform EXXON MOBIL that it has been in violation of Proposition 65 from the time period from four years prior to the date of this notice and continues to be in violation, for every day upon which EXXON MOBIL owns and/or controls the underground storage tank systems for any Facility listed on Exhibit A.

Proposition 65 requires that notice and intent to sue be given to EXXON MOBIL sixty days before a suit is filed. With this letter, CDG gives notice of the alleged violations to EXXON MOBIL and the appropriate governmental authorities. This notice covers all violations of Proposition 65 that are currently known to CDG from information now available to it. CDG reserves the right to amend this Notice to inform EXXON MOBIL of other violations and/or exposures as it gathers further information. With the copy of this amended notice submitted to EXXON MOBIL, a copy is provided of “The Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65): A Summary.”

Dated: September 20, 2005

By:

  
\_\_\_\_\_  
Anthony G. Graham, Esq.

**CERTIFICATE OF MERIT**  
**Health and Safety Code Section 25249.7(d)**

I, Anthony G. Graham, hereby declare:

1. This Certificate of Merit accompanies the attached sixty-day notice(s) in which it is alleged the parties identified in the notices have violated Health and Safety Code section 25249.6 by failing to provide clear and reasonable warnings.

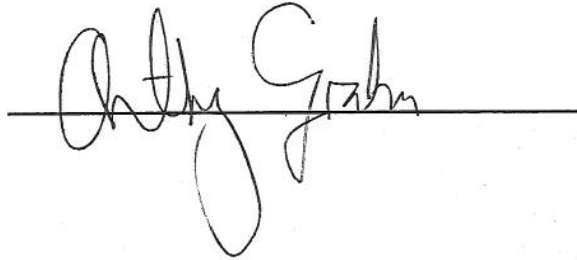
2. I am member of the State Bar of California, a partner of the law firm of Graham & Martin, LLP, and attorney for noticing party Consumer Defense Group Action.

3. I have consulted with one or more persons with relevant and appropriate experience or expertise who has reviewed facts, studies, or other data regarding the alleged exposures to the listed chemicals that are the subject of the action.

4. Based on the information obtained through those consultations, and on all other information in my possession, I believe there is a reasonable and meritorious case for the private action. I understand that "reasonable and meritorious case for the private action" means that the information provides a credible basis that all elements of the plaintiffs' case can be established and the information did not prove that the alleged violator will be able to establish any of the affirmative defenses set forth in the statute.

5. The copy of this Certificate of Merit served on the Attorney General attaches to it factual information sufficient to establish the basis for this certificate, including the information identified in Health and Safety Code section 25249.7(h)(2), i.e., (1) the identity of the persons consulted with and relied on by the certifier, and (2) the facts, studies, or other data reviewed by those persons.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed at Costa Mesa, California on September 21, 2005.

A handwritten signature in black ink, appearing to read "Anthony G. Gohm", is written over a horizontal line. The signature is fluid and cursive, with the first name "Anthony" and the last name "Gohm" being clearly legible.



# EXHIBIT A

12402 Washington Place Los Angeles, CA 90066 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)	6600 West Manchester Avenue, Los Angeles, CA 90045 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)
254 West Slauson Avenue Los Angeles, CA 90003 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)	3309 West Olympic Boulevard, Los Angeles, CA 90019 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)
6600 West Manchester Avenue Los Angeles, CA 90045 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)	10863 West Olympic Boulevard, Los Angeles, CA 90064 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)
520 North Alameda Street Los Angeles, CA 90012 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)	1769 West Imperial Highway, Los Angeles, CA 90047 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)
7601 South Sepulveda Boulevard Los Angeles, CA 90045 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)	9115 Woodman Avenue, Pacoima, CA 91331 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)
13310 Osbourne Street Pacoima, CA 91331 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)	5215 West Centinela Avenue, Los Angeles, CA 90045 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)
5857 West Sunset Boulevard Los Angeles, CA 90028 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)	100 South Beach Boulevard, Anaheim, CA 92804 Coastal Plain of Orange County Groundwater basin (Sub-Basin 8-1)
849 Beverly Blvd. Los Angeles, CA 90048 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)	700 North Brookhurst Street, Anaheim, CA 92801 Coastal Plain of Orange County Groundwater basin (Sub-Basin 8-1)
315 West Vernon Avenue Los Angeles, CA 90037 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)	2800 East Lincoln Avenue, Anaheim, CA 92806 Coastal Plain of Orange County Groundwater basin (Sub-Basin 8-1)
303 West Florence Avenue Los Angeles, CA 90003 (323) 971-2175 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)	741 South Weir Canyon Road, Anaheim, CA 92808 Coastal Plain of Orange County Groundwater basin (Sub-Basin 8-1)

Chung's Mobil Service Center 1904 West Washington Blvd. Los Angeles, CA 90018 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)	1100 North Euclid Street, Anaheim, CA 92801 Coastal Plain of Orange County Groundwater basin (Sub-Basin 8-1)
10551 Wilshire Boulevard Los Angeles, CA 90024 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)	Euclid And La Palma, Anaheim, CA 92801 Coastal Plain of Orange County Groundwater basin (Sub-Basin 8-1)
7130 Crenshaw Blvd. Los Angeles, CA 90043 (323) 750-7585 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)	400 North Lakeview Avenue, Anaheim, CA 92807 Coastal Plain of Orange County Groundwater basin (Sub-Basin 8-1)
657 North Vermont Ave. Los Angeles, CA 90004 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)	1100 North Euclid Street, Anaheim, CA 92801 Coastal Plain of Orange County Groundwater basin (Sub-Basin 8-1)
19304 Satcoy Street Reseda, CA 91335 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)	956 South Sedona Lane, Anaheim, CA 92808 Coastal Plain of Orange County Groundwater basin (Sub-Basin 8-1)
1166 South Soto Street Los Angeles, CA 90023 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)	14493 Culver Drive, Irvine, CA 92604 Coastal Plain of Orange County Groundwater basin (Sub-Basin 8-1)
4380 West Adams Blvd. Los Angeles, CA 90018 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)	17551 Macarthur Boulevard, Irvine, CA 92614 Coastal Plain of Orange County Groundwater basin (Sub-Basin 8-1)
1690 South Alameda Street Los Angeles, CA 90021 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)	5410 Walnut Avenue, Irvine, CA 92604 Coastal Plain of Orange County Groundwater basin (Sub-Basin 8-1)
520 North Alameda Street Los Angeles, CA 90012 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)	5333 University Drive, Irvine, CA 92612 Coastal Plain of Orange County Groundwater basin (Sub-Basin 8-1)
1277 North Western Avenue Los Angeles, CA 90029 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)	4800 Barranca Parkway, Irvine, CA 92604 Coastal Plain of Orange County Groundwater basin (Sub-Basin 8-1)
2608 Temple Street Los Angeles, CA 90026 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)	3195 Harbor Boulevard, Costa Mesa, CA 92626 Coastal Plain of Orange County Groundwater basin (Sub-Basin 8-1)
5700 Hollywood Blvd. Los Angeles, CA 90028 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)	3195 Harbor Boulevard, Costa Mesa, CA 92626 Coastal Plain of Orange County Groundwater basin (Sub-Basin 8-1)
6228 Franklin Ave.	3470 Fairview Road, Costa Mesa, CA 92626



Los Angeles, CA 90028 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)	Coastal Plain of Orange County Groundwater basin (Sub-Basin 8-1)
307 North La Brea Avenue Los Angeles, CA 90036 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)	3006 Harbor Boulevard, Costa Mesa, CA 92626 Coastal Plain of Orange County Groundwater basin (Sub-Basin 8-1)
11400 South Vermont Ave. Los Angeles, CA 90044 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)	2145 Placentia Avenue, Costa Mesa, CA 92627 Coastal Plain of Orange County Groundwater basin (Sub-Basin 8-1)
6601 Melrose Avenue Los Angeles, CA 90038 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)	9001 Adams Avenue, Huntington Beach, CA 92646 Coastal Plain of Orange County Groundwater basin (Sub-Basin 8-1)
655 North Western Ave. Los Angeles, CA 90004 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)	16001 Beach Boulevard, Huntington Beach, CA 92647 Coastal Plain of Orange County Groundwater basin (Sub-Basin 8-1)
7865 West Sunset Boulevard Los Angeles, CA SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)	20731 Hopetown Lane, Huntington Beach, CA 92646 Coastal Plain of Orange County Groundwater basin (Sub-Basin 8-1)
7208 Reseda Boulevard, Reseda, CA 91335 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)	Beach And Slater, Huntington Beach, CA 92646 Coastal Plain of Orange County Groundwater basin (Sub-Basin 8-1)
2503 West Pico Boulevard Los Angeles, CA 90006 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)	6685 Atlantic Avenue, Long Beach, CA 90805 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)
3915 East Olympic Boulevard, Los Angeles, CA 90023 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)	655 East Carson Street, Carson, CA 90745 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)
3915 East Olympic Boulevard, Los Angeles, CA 90023 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)	2601 Atlantic Avenue, Long Beach, CA 90806 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)
8380 Santa Monica Boulevard W Hollywood, CA 90069 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)	5005 Long Beach Boulevard, Long Beach, CA 90805 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)
7100 West Sunset Boulevard Los Angeles, CA 90046 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)	22240 Avalon Boulevard, Carson, CA 90745 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)
9448 West Pico Boulevard Los Angeles, CA 90035 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)	8090 East Wardlow Road, Long Beach, CA 90808 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)



19304 Saticoy Street, Reseda, CA 91335 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)	2200 North Bellflower Boulevard, Long Beach, CA 90815 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)
5700 Hollywood Boulevard Los Angeles, CA 90028 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)	3280 East 59th Street, Long Beach, CA 90805 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)
1051 North Highland Avenue Los Angeles, CA 90038 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)	1701 West Whittier Boulevard, Whittier, CA 90601 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)
1051 North Highland Avenue Los Angeles, CA 90038 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)	Avalon Bl And Del Amo, Carson, CA 90745 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)
7865 West Sunset Boulevard Los Angeles, CA 90046 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)	9405 Whittier Boulevard, Pico Rivera, CA 90660 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)
19248 Victory Boulevard Reseda, CA 91335 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)	22802 Figueroa Street, Carson, CA 90745 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)
3071 South Robertson Boulevard Los Angeles, CA 90034 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)	6401 East Pacific Coast Highway, Long Beach, CA 90803 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)
3950 West Olympic Boulevard Los Angeles, CA 90019 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)	10737 Beverly Boulevard, Whittier, CA 90601 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)
8650 Belford Avenue, Los Angeles, CA 90045 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)	9800 East Alondra Bl, Long Beach, CA 90802 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)
2305 South La Cienega Boulevard, Los Angeles, CA 90034 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)	1351 East Dyer Road, Santa Ana, CA 92705 Coastal Plain of Orange County Groundwater basin (Sub-Basin 8-1)
18510 Victory Boulevard, Reseda, CA 91335 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)	9024 Warner Avenue, Fountain Valley, CA 92708 Coastal Plain of Orange County Groundwater basin (Sub-Basin 8-1)
301 South Atlantic Boulevard, Los Angeles, CA 90022 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)	16230 South Harbor Boulevard, Santa Ana, CA 92704 Coastal Plain of Orange County Groundwater basin (Sub-Basin 8-1)
19650 Sherman Way, Reseda, CA 91335 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)	1465 South Main Street, Santa Ana, CA 92707 Coastal Plain of Orange County Groundwater basin (Sub-Basin 8-1)



1600 North Eastern Avenue, Los Angeles, CA 90063 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)	2702 West 1st Street, Santa Ana, CA 92703 Coastal Plain of Orange County Groundwater basin (Sub-Basin 8-1)
1010 North Soto Street, Los Angeles, CA 90033 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)	
1660 South Sepulveda Boulevard, Los Angeles, CA 90025 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)	
850 West Century Boulevard, Los Angeles, CA 90044 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)	
6301 Santa Monica Boulevard, Los Angeles, CA 90038 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)	

### CERTIFICATE OF SERVICE

I am over the age of 18 and not a party to this case. I am a resident of or employed in the county where the mailing occurred. My business address is 950 South Coast Drive, Suite 220, Costa Mesa, California 92626.

I SERVED THE FOLLOWING:

- 1.) 60-Day Notice of Intent to Sue Under Health & Safety Code Section 24249.6;
- 2.) The Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65): A Summary (*only sent to violators.*)

by enclosing a true copy of the same in a sealed envelope addressed to each person whose name and address is shown below and depositing the envelope in the United States mail with the postage fully prepaid:

Date of Mailing: September 20, 2005

Place of Mailing: Costa Mesa, California

NAME AND ADDRESS OF EACH PERSON TO WHOM DOCUMENTS WERE MAILED:

Lee R. Raymond, Chairman and CEO Exxon Mobil Corporation 5959 Las Colinas Blvd. Irving, TX 75039-2298	California Attorney General (Proposition 65 Enforcement Division) 1515 Clay Street, 20th Floor Oakland, CA
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Los Angeles City Attorney  
200 N. Main St. N.E.  
Los Angeles, CA 90012

Los Angeles County DA  
210 W. Temple Street, 18th Floor  
Los Angeles, CA 90012

San Francisco City Attorney  
1390 Market Street  
San Francisco, CA 94102

San Francisco County DA  
880 Bryant Street  
San Francisco, CA 94103

Orange County District Attorney  
700 Civic Center Dr. W., 2<sup>nd</sup> Fl.  
Santa Ana, CA 92701

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Dated: September 21, 2005

